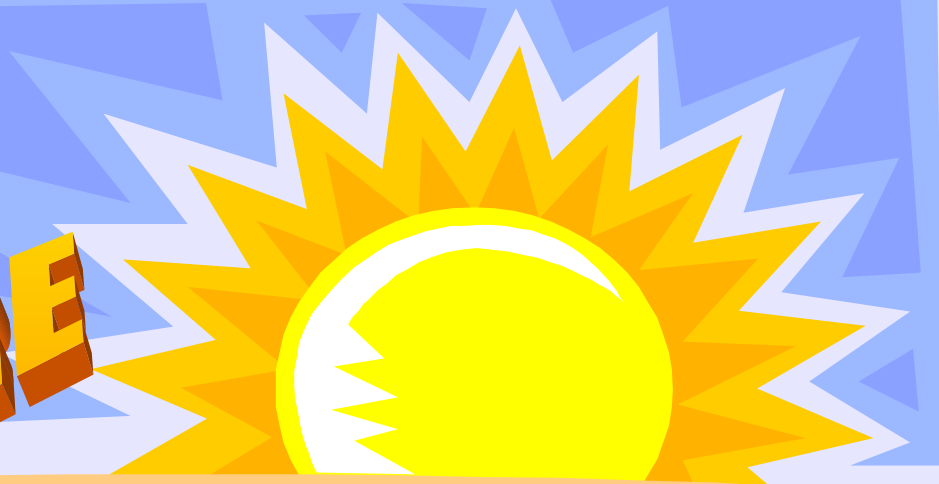


EARLY COI DISCLOSURE



BACKGROUND

- CONTRACTORS HAVE RAISED CONCERNS AND QUESTIONS ABOUT ONLY PUBLISHING “DRAFT” COI PLANS UNTIL SOLICITATIONS ARE RELEASED
- DOES NOT LEAVE SUFFICIENT TIME TO ASSESS ELIGIBILITY AND ESTABLISH COMPETITIVE TEAMS

ISSUE

➤ **HOW CAN OAM PROVIDE
EARLIER DISCLOSURE OF ITS
“COI REQUIREMENTS” TO
CONTRACTORS?**

➤ **PURPOSE**

❖ **TO FACILITATE CONTRACTORS' ABILITY
TO BETTER ASSESS ELIGIBILITY FOR
AWARDS AND TO ASSEMBLE COI FREE
TEAMS WHEN PREPARING PROPOSALS**

CURRENT POLICY

- FAR REQUIRES EVALUATION TO DETERMINE IF SIGNIFICANT COI EXISTS
- COI PLANS REQUIRE APPROVAL BEFORE RELEASE OF SOLICITATIONS, AND
- EARLY COI DISCLOSURE “ENCOURAGED” WHENEVER POSSIBLE

PROPOSED NEW STRATEGY

➤ **DIVIDE ALL PROCURMENTS INTO THREE GROUPS:**

❖ **CATEGORY 1**

- “NO” COI ISSUES

❖ **CATEGORY 2**

- “COI ISSUES,” BUT NO CHANGE FROM PREVIOUS STRATEGY, AND

❖ **CATEGORY 3**

- “COI ISSUES” FOR FIRST TIME REQUIREMENTS OR THOSE FOLLOW-ON STRATEGIES THAT CHANGE

NEW STRATEGY **(CONTINUED)**

➤ **PUBLISH COI STRATEGY INFO WITH
ACQUISITION FORECAST DATABASE**

➤ **CAT 1&2**

❖ **EITHER INDICATE “NO COI” OR POST PREVIOUS
COI STRATEGY**

➤ **CAT 3**

❖ **INCLUDE COI CLAUSES, INCLUDING LOFC**

❖ **HIGHLIGHT ANY RESTRICTIONS OR
ELIGIBILITY REQUIREMENTS**

NEW STRATEGY

(CONTINUED)

➤ **NEW PROCESS FOR CAT 3 REQUIREMENTS**

❖ **REQUIREMENT EVALUATED BY COs**

❖ **BASED ON SIGNIFICANCE OF COI ISSUES, CHANGES IN STRATEGY, ETC.---CO DETERMINES IF AND HOW MUCH “EXTRA” ADVANCE NOTICE TIME TO GIVE:**

- **AFTER COI STRATEGY PUBLISHED BUT BEFORE SOLICITATION ISSUED, OR**
- **EXTENDING BID TIME, OR**
- **COMBINATION OF BOTH**

NEXT STEPS

- **REQUEST YOUR
COMMENTS/
RECOMMENDATIONS**
- **EVALUATE RESPONSES**
- **BEGIN IMPLEMENTATION
PROCESS**

PROVIDE FEEDBACK TO:

➤ **CAL McWHIRTER**

1200 Penn. Ave. NW

Washington, D.C. 20460

➤ **Phone (202) 564-4379**

➤ **E-mail: cmcwhirter@epa.gov**